

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ROBERTSON FIRE PROTECTION  
DISTRICT,

Plaintiff,

vs.

DONALD D. MINER,

Defendant.

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Cause No. 4:24-cv-00026-JAR

***DEFENDANT'S EXHIBIT LIST***

COMES NOW Defendant Donald D. Miner, by and through his undersigned counsel, and  
for his Pre-Trial Compliance, submits the following Exhibit List:

**Will be Offered at Trial:**

Exhibit A

**May be Offered at Trial:**

Exhibits B-Z

Exhibit No.	Bates/Exhibit Nos.	Description
A	MINER 000043 – 000045	District Executed Contract/Employment Agreement with Defendant Don Miner
B	MINER 000001	Employee Benefit Sick and Comp
C	MINER 000002 – 000008	May 26, 2020, Board Meeting Minutes
D	MINER 00026 – 000027	2016 Tahoe receipts
E	MINER 000028 – 000030	Accrued Leave of Don Miner as of May 7, 2020
F	MINER 000031 – 000035	Accrued Leave of Don Miner as of June 2, 2020

G	MINER 000036	Accrued Vacation Time of Don Miner
H	MINER 000037 – 000040	Receipts for iPad, MIFI Jetpack, Surface Pro Computer and iPhone
I	MINER 000046 – 000052	Documents of staff car sales
J	MINER 000053 – 000055	Employment Agreement Chief David J. Tilley
K	MINER 000056	Tentative Agenda for Open Board Meeting September 11, 2023
L	MINER 000057	Letter from Sentinel to Don Miner Dated October 19, 2016
M	MINER 000058	Tentative Agenda for Open Board Meeting October 30, 2023
N	MINER 000059	Video from September 11, 2023 Board Meeting
O	MINER 000073	Hazelwood City Council Meeting March 20, 2023
P	MINER 000091 – 000102	Regular Open Board Meeting September 11, 2023
Q	MINER 000137 – 000199	Exhibits 1-30 produced during the deposition of Kelly Harrington
R	MINER 000279 - 000280	Signed affidavit of Dave Herman identified as Exhibit F in the deposition of Dave Herman
S S-1	MINER 000281 – 000318 MINER 000646 - 000650	Videotaped deposition of Jennifer Guyton taken on December 5, 2023
T T-1	MINER 000319 – 000466 MINER 000651 - 000655	Videotaped deposition of Jennifer Guyton taken on April 18, 2024
U U-1	MINER 000467 – 000523 MINER 000656	Videotaped deposition of Dave Herman taken August 27, 2024
V V-1	MINER 000524 – 000593 MINER 000657-000659	Videotaped deposition of Suzette Stoyanov taken August 27, 2024
W	MINER 000594 - 000643	Deposition of Kelly Harrington taken March 26, 2024
X	MINER 000060 – 000062	“We’re Listening and Learning” Article
Y	MINER 000200 – 000278	Citizens to Save Package by Hazelwood & Fire Services
Z	MINER 000644 - 000645	Email from Jennifer Guyton to all rank-and-file firefighters on September 14, 2023, Exhibit C

		from Jennifer Guyton depo taken on April 18, 2024
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Defendant reserves the right to adopt as exhibits any exhibits designated by Plaintiff. It further reserves the right to designate additional exhibits in response to ongoing discovery or further pleadings by Plaintiff. Such additional exhibits may include visual aids that cannot be determined until discovery in this case is completed.

/s/ Steven J. Hughes

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I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 25<sup>th</sup> day of March 2025 to be served by operation of the Court's electronic filing system upon the following or U.S. mail for parties not registered with CM/ECF, on this 25<sup>th</sup> day of March 2025: **Mr. Paul Martin**, Attorney for Plaintiff, 9322 Manchester Road, St. Louis, Missouri 63119; Email: [paul@paulmartinlaw.org](mailto:paul@paulmartinlaw.org); **Mr. Sean M. Elam and Mr. Elkin L. Kistner**, Attorneys for Plaintiff, 1406 North Broadway, St. Louis, Missouri 63102; Email: [smelam@law-fort.com](mailto:smelam@law-fort.com) and [elkinkis@law-fort.com](mailto:elkinkis@law-fort.com).

/s/ Steven J. Hughes